

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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Federal Communications Commission
Office of Secretary

In the Matter of:)
)
Amendment of Section 73.202(b),) MB Docket No. 05-152
Table of Allotments,) RM-11204
FM Broadcast Stations.)
(Clinton and Mayfield, Kentucky))

To: Marlene H. Dortch, Secretary
Attn: Chief, Audio Division
Media Bureau

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COMMENTS OF BRISTOL BROADCASTING COMPANY, INC.

Bristol Broadcasting Company, Inc. ("Bristol Broadcasting"), licensee of WLLE(FM) (FCC Facility ID No. 56556), Channel 271C3, Clinton, Kentucky, and WQQR(FM) (FCC Facility ID No. 71613), Channel 234C2, Mayfield, Kentucky, and WLIE-FM (FCC Facility ID No. 40647), Channel 232A, Golconda, Illinois, by its attorneys, hereby submits its Comments in support of the proposal set forth in the Notice of Proposed Rulemaking, DA 05-765, released March 25, 2005 (the "NPRM").

The NPRM proposes that the FM Table of Allotments, Section 73.202(b) of the Commission's rules, be amended to (a) reallocate Channel 271C3 from Clinton to Mayfield, Kentucky, to upgrade the allotment of Channel 271C3 to Channel 271C2 and to modify the license of WLLE accordingly; and (b) reallocate Channel 234C2 from Mayfield to Clinton, Kentucky, and to modify the license of WQQR accordingly. To avoid any shortspacing to the proposed reallocation of Channel 234C2 at Clinton, Kentucky, Bristol Broadcasting has agreed to accept a restricted transmitter site location for WLIE-FM. If the reallocation proposed in the NPRM is adopted, the Table of Allotments would be changed as follows:

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Clinton, Kentucky	271C3	234C2
Mayfield, Kentucky	234C2	271C2

There are compelling public interest reasons for approval of the changes set forth in the NPRM. The exchange of allotted channels at Clinton and Mayfield, Kentucky, would allow the upgrade of Channel 271 from C3 to C2 status, thus resulting in a preferential arrangement of allotments and improved service to the

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public. The reallocation would provide broadcast service to an additional 126,326 persons, and additional area of 3,759 square miles.

The proposal conforms to all Commission engineering and other rules and policies. It would enhance service to listeners, and only impact stations already owned by Bristol Broadcasting.

Bristol Broadcasting reiterates its intent to promptly file applications to implement the changes contemplated in the NPRM should they be adopted. Specifically, the petitioner will tender applications for construction permits to move the transmitter/antenna sites and change the operating parameters of Stations WQQR, WLLE, and WLIE-FM in accordance with the NPRM. If awarded the permits, the petitioner pledges to promptly construct each of the proposed facilities.

In sum, the instant proposal is deserving of prompt approval so that service to the residents of Western Kentucky may be improved. Bristol Broadcasting Company, Inc., therefore, requests that the Table of Allotments, FM Broadcast Stations, Section 73.202(b) be amended as proposed in the NPRM.

Respectfully submitted,

Bristol Broadcasting Company, Inc.

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